## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

K.S.,

Plaintiff.

Case No. 14-cv-12214 Hon. David M. Lawson Mag. Michael J. Hluchaniuk

v.

DETROIT PUBLIC SCHOOLS, a Michigan municipal corporation, CHARLES PUGH, ROY ROBERTS, ROBERT BOBB, BERRY GREER, and MONIQUE MCMURTRY,

Defendants.

SEIKALY STEWART & BENNETT, P.C. Attorneys for Plaintiff WILLIAM R. SEIKALY (P33165) CHOI T. PORTIS (P77123) BENJAMIN J. WILENSKY (P75302) 30455 Northwestern Highway, Ste. 250 Farmington Hills, MI 48334 (248)785-0102 wrs@sslawpc.com DETROIT PUBLIC SCHOOLS
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DELDIN LAW, PLLC Attorneys for Defendant Charles Pugh MARC A. DELDIN (P71041) 48 South Main Street, Ste. 3 Mount Clemens, MI 48043 (586) 741-8116 marc@deldinlaw.com PLAINTIFF'S REPLY TO DEFENDANTS' RESPONSE [DKT. NO. 50] TO SECOND MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO MOTION FOR JUDGMENT ON THE PLEADINGS ON BEHALF OF DEFENDANTS DETROIT PUBLIC SCHOOLS, ROY ROBERTS, ROBERT BOBB, BERRY GREER, AND MONIQUE MCMURTRY [DKT. NO.46]

NOW COMES the Plaintiff, K.S., by and through his attorneys, SEIKALY STEWART & BENNETT, P.C., and for his Reply states:

Defendants confuse the substance of the motion for judgment on the pleadings that is before the Court with the question of whether the Court's discretion should be exercised to allow three (3) additional days of time to respond to that motion, when lead counsel, William Seikaly, spent several days in the hospital, unable to work on the brief. This happened at the same time that Mr. Seikaly's deposition schedule in another case is at a fever pitch. This is a civility issue. The substantive response is where the merits of the lawsuit should be discussed. Plaintiff therefore respectfully requests that the motion for this brief additional extension of time be granted.

Respectfully submitted,

SEIKALY STEWART & BENNETT, P.C. Attorneys for Plaintiff

By: /s/ Benjamin J. Wilensky
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Dated: March 20, 2015

## **CERTIFICATE OF SERVICE**

Benjamin J. Wilensky hereby certifies that on this 20<sup>th</sup> day of March, 2015, he filed the foregoing document with the Clerk of the Court via the Court's ECF system, which will automatically serve the document upon all counsel of record.

/s/ Benjamin J. Wilensky (P75302)

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